



## Testimony of Connecticut Fund for the Environment Before the Committee on Government Administration and Elections

## In support of H.B. No. 5618, AN ACT REQUIRING THE DEVELOPMENT OF A CARBON FOOTPRINT METHODOLOGY TO ANALYZE STATE PROCUREMENT CONTRACTS

Submitted by Shannon Laun Energy & Environment Attorney March 18, 2016

Connecticut Fund for the Environment (CFE) is a non-profit environmental organization with over 5,500 members statewide. The mission of CFE, and its bi-state program Save the Sound, is to protect and improve the land, air, and water of Connecticut and Long Island Sound. We use legal and scientific expertise and bring people together to achieve results that benefit our environment for current and future generations.

Dear Senator Cassano, Representative Jutila, and members of the Committee on Government Administration and Elections:

Connecticut Fund for the Environment (CFE) submits this testimony in support of Proposed H.B. 5618, An Act Requiring the Development of a Carbon Footprint Methodology to Analyze State Procurement Contracts. This bill would require the Department of Administrative Services to develop a carbon footprint methodology for state procurement contracts, and submit a report that includes the methodology and recommendations for legislation needed to implement the methodology. CFE supports development of such a methodology, and we support the general purpose of this bill. However, we recommend strengthening the bill language as stated below.

This is not the first time the legislature has considered the carbon footprint of state procurement contracts. Three years ago, in Public Act 13-247, the legislature directed the Department of Administrative Services (DAS) to "study the feasibility of including carbon footprint data as factors in the award of state contracts." In 2014, as directed by this legislation, DAS released a *Report on Carbon Footprint Data as Factors in Awarding State Contracts*.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> P.A. 13-247, sec. 73.

<sup>&</sup>lt;sup>2</sup> DAS, *Report on Carbon Footprint Data as Factors in Awarding State Contracts* (Feb. 2014) [hereinafter DAS Report].

In this report, DAS noted: "the state does not have an existing [carbon footprint] methodology." The time has come to develop such a methodology. The Governor's Council on Climate Change is updating the state's climate strategy, and there is widespread agreement that the Connecticut state government must lead by example in reducing greenhouse gas emissions. Establishing a strong carbon footprint methodology for state procurement contracts would be a step in the right direction.

CFE recommends strengthening H.B. 5618 as follows. First, the bill should include a definition of carbon footprint to make it clear what is meant by this term. There is no existing definition of the term in Connecticut state law or regulations, so a definition is needed in the bill. The definition should make it clear that: (1) a carbon footprint includes *all* greenhouse gases that are directly or indirectly traceable to a given entity, not just emissions of carbon dioxide; and (2) any entity, including a product, can have a carbon footprint (*i.e.*, the term "carbon footprint" is a generally applicable term). For example, "carbon footprint" could be defined as follows: "The total amount of greenhouse gas emissions that are directly or indirectly traceable to an entity, such as a product, building, person, organization, or event."

Second, the carbon footprint methodology should not focus mostly on transportation-related impacts. As DAS noted in its report, "transportation of goods and services contributes a minimal amount of emissions when compared to the manufacturing and development phases of a product, all of which are part of a product's carbon footprint." A carbon footprint methodology that focuses primarily on transportation-related emissions would miss an opportunity for greater greenhouse gas reductions. A sound methodology should not weight certain sources of emissions more heavily than other sources. Notably, Connecticut's Global Warming Solutions Act (Public Act 08-98), which requires the state to reduce greenhouse gas emissions at least 80 percent from 2001 levels by 2050, does not specify reductions from particular sources. Likewise, a carbon footprint methodology should treat all sources of emissions equally.

In conclusion, CFE supports H.B. 5618, which would require a carbon footprint methodology to be established for state procurement contracts, and we urge the Committee to strengthen the bill by (1) including a definition of "carbon footprint"; and (2) removing the focus on transportation-related emissions, which is inappropriate because those emissions are usually a small proportion of total emissions, and because particular sources of emissions should not be weighted more heavily than others.

Thank you for your time and consideration in this matter.

Respectfully submitted,

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<sup>&</sup>lt;sup>3</sup> *Id.* at 5.

<sup>&</sup>lt;sup>4</sup> DAS Report, at 6.